

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
HINDS COUNTY, MISSISSIPPI**

**DR. DONALD RAGGIO
DR. CHRIS RAGGIO**

PLAINTIFFS

VS.

CAUSE NO. 14-CV-00071-TTG

MTGOX, et al.

DEFENDANTS

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' SIXTH SET OF REQUESTS FOR PRODUCTION**

COME NOW the Plaintiffs, by and through counsel, in the above styled and numbered cause, and file this their Response to Defendants' Sixth Set of Requests for Production, as follows:

GENERAL OBJECTIONS AND QUALIFICATIONS

These responses are made based on information presently available to the Plaintiffs. As discovery in this case is incomplete, there may be further facts that develop which may affect the Plaintiffs' response which the Plaintiffs are presently unaware despite due diligence. The Plaintiffs reserve the right to modify or supplement their response with such relevant information they may subsequently discover. As such, their response is made without prejudice to them using or relying at trial on information herein omitted through a good faith oversight, error or mistake, though subsequently discovered.

Subject to these general qualifications, specific objections and responses are set out below:

REQUEST NO. 1:

Produce a copy of any documents, screenshots, or other records in any form which reflect or otherwise evidence any claim you made in any bankruptcy proceedings involving MTGOX or Mark Karpeles.

RESPONSE: None exist.

EXHIBIT E

REQUEST NO. 2:

If you filed a claim in any bankruptcy case, proceeding, or action in which MTGOX is a debtor, produce a copy of any documents, screenshots, or other records in any form which reflect whether and in what amount your claim has been accepted or rejected by the trustee, including but not limited to records to be obtained via the method the trustee has set forth in the attached Exhibit A for MTGOX users who filed claims online.

RESPONSE: None exist.

REQUEST NO. 3:

If you filed a claim in any bankruptcy case, proceeding, or action in which Mark Karpeles is a debtor, produce a copy of any documents, screenshots, or other records in any form which reflect whether and in what amount your claim has been accepted or rejected by the trustee.

RESPONSE: None exist.

REQUEST NO. 4:

Produce a copy of any canceled checks, wire transfers, screenshots, bank statements or other records which reflect or otherwise evidence any monies, bitcoins, or any other items of value you received on or after March 5, 2014, from MTGOX, Mark Karpeles, any other named defendant, or any bankruptcy trustee administering the estate of any person or entity named as a defendant in this suit.

RESPONSE: None exist.

RESPECTFULLY SUBMITTED, this the 30th day of August, 2017.

**DR. DONALD RAGGIO
AND CHRIS RAGGIO**

s/Charles "Brad" Martin

CHARLES "BRAD" MARTIN, MSB# 100767

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a true and correct copy of the above and foregoing pleading via email on the following:

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Respectfully submitted, this the 30th day of August, 2017.

s/ Charles B. Martin
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